

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

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**JOHN DOE,**

**Plaintiff,**

**Civil Action No:**

**NOTICE OF MOTION**

**-against-**

**UNIVERSITY OF TEXAS HEALTH SCIENCE  
CENTER AT HOUSTON, UNIVERSITY  
OF TEXAS BOARD OF REGENTS,  
MARGARET MCNEESE, in her individual  
and official capacity, DEANA MOYLAN,  
in her individual and official capacity,  
SHEELA LAHOTI, in her individual and  
official capacity, and DANA MCDOWELLE,  
in her individual and official capacity,**

**Defendants.**

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**PLEASE TAKE NOTICE** that Plaintiff, through his attorneys, Nesenoff & Miltenberg, LLP, and Jordan, Lynch & Cancienne PLLC hereby moves this Court for an *ex parte* order: (i) authorizing Plaintiff to file the Complaint, summons, and civil cover sheet in this action using the pseudonym “John Doe,” and to litigate this matter as John Doe, and to file all other papers in this action under the name John Doe, and to identify certain other non-parties by pseudonym; and (ii) prohibiting Defendants (and their agents, employees, and representatives) from publicly identifying Plaintiff, in court filings or otherwise.

**PLEASE TAKE FURTHER NOTICE THAT** Plaintiff shall rely upon the Complaint and accompanying Memorandum of Law and the Declaration of Andrew Miltenberg, Esq., in support of the Motion. Plaintiff also submits a proposed form of Order with this Motion.

**Dated: New York, New York**  
**April 30, 2021**

**Respectfully submitted,**

**NESENOFF & MILTENBERG, LLP**  
*Attorneys for Plaintiff John Doe*

By: /s/ Andrew Miltenberg

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-and-

**JORDAN, LYNCH & CANCIENNE PLLC**

By: /s/ Walter Lynch

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